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**Wagner Regulatory
Associates, Inc.**

454814-00

P.O. Box 7954
Wilmington, DE 19803-0954

Hand Delivered

August 17, 2001

Document Processing Desk (APPL)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

Tel: (302) 529-9075 or 9076
Fax: (302) 529-5638
Internet: wagnerreg.com
Email: jim@wagnerreg.com

74286-R

Re: DISHWASHER MAGIC® containing Citric Acid -
Application for Registration

On behalf of Dishwasher Magic LLC, I am submitting the enclosed application to register the new product DISHWASHER MAGIC® containing the active ingredient citric acid. It is requested that the Agency approve this application under FIFRA Section 3(c)(7)(A) on the basis that the product DISHWASHER MAGIC® is substantially similar to existing registrations and use patterns currently registered with EPA that contain citric acid.

Please note that EPA issued a Reregistration Eligibility Document (RED) for citric acid in 1992. In the RED, EPA has waived all generic data requirements other than product chemistry, acute toxicity, and product performance. To satisfy the product chemistry data requirements for the technical grade of active ingredient (TGA) of citric acid we have cited the same scientific literature used to support the RED. Ms. Karen Hicks in the Antimicrobial Division confirmed to me on August 15, that citing the RED to satisfy the data requirements for the TGA is acceptable provided that the citric acid in DISHWASHER MAGIC® is manufactured using the same process as discussed in the RED. I have included a certification in this application that this is the case.

Therefore, in support of this application I am submitting the following data and information for Agency review:

ADMINISTRATIVE VOLUME:

- EPA Application Form 8570-1
- Proposed label for DISHWASHER MAGIC® together with a discussion of use conditions
- Certification with Respect to Citation of Data Form 8570-34
- Confidential Statement of Formula Form 8570-4 with MSDS for each inert ingredient
- Data Matrix Form 8570-35
- Letter from Dishwasher Magic LLC appointing Wagner Regulatory Associates, Inc. as agent
- Letter from U.S. EPA assigning Dishwasher Magic LLC company number 74286

Data Transmittal Document

VOLUME 1: Product Identity, Composition and Analysis


VOLUME 2: Physical/Chemical Properties

VOLUME 3: Physical/Chemical Properties of DISHWASHER MAGIC®

VOLUME 4: Physical and Chemical Characteristics: Physical State, pH, Viscosity, and Density/Relative Density

VOLUME 5: Primary Eye Irritation Study in Rabbits
VOLUME 6: Primary Skin Irritation Study in Rabbits
VOLUME 7: Acute Oral Toxicity Study in Rats – Limit Test
VOLUME 8: Acute Dermal Toxicity Study in Rats – Limit Test
VOLUME 9: Acute Inhalation Toxicity and Skin Sensitization: Request for Data Waivers
VOLUME 10: AOAC Use Dilution Test Broad Spectrum
VOLUME 11: AOAC Use Dilution Test

Please call me if you have any questions about this submission. Thank you for your help with this application.


James M. Wagner
AGENT FOR DISHWASHER MAGIC LLC

cc: Mr. Kevin Schmidt, Dishwasher Magic LLC
Wyckoff, New Jersey

Mr. Adam Heyward
Product Manager
EPA, OPP
Antimicrobial Division

Figure 1 displays 16 small plots arranged in a 4x4 grid, showing the spatial distribution of the number of species per 100 m². The plots are labeled with numbers 1 through 16. The top row (plots 1-4) shows a relatively uniform distribution of species. The second row (plots 5-8) shows a more heterogeneous distribution with some areas having higher species counts. The third row (plots 9-12) shows a highly heterogeneous distribution with many areas having zero species. The bottom row (plots 13-16) shows a very heterogeneous distribution with a few areas having high species counts and many areas having zero species.

DATA TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

Wagner Regulatory Associates, Inc.
Agent for Dishwasher Magic LLC
P.O. Box 7954
Wilmington, DE 19803-0954

2. Regulatory Action In Support Of Which This Package Is Submitted

Application for Registration
Dishwasher Magic®
EPA Registration Number 74286-

3. Transmittal Date

August 14, 2001

4. List of Submitted Studies

Vol. 1, Wagner, J.M., "Product Identity, Composition, Analysis," Wagner Regulatory Associates, Inc., Wilmington, DE, Report No. WRA-01-001, 30 pages. **45481401**

Vol. 2, Wagner, J.M., "Physical/Chemical Properties," Wagner Regulatory Associates, Inc., Wilmington, DE, Report No. WRA-01-002, 26 pages. **45481402**

Vol. 3, Wagner, J.M., "Physical/Chemical Properties of Dishwasher Magic®", Wagner Regulatory Associates, Inc., Wilmington, DE, Report No. WRA-01-003, 5 pages. **45481403**

Vol. 4, Wo, C., "Physical and Chemical Characteristics: Physical State, pH, Viscosity, and Density/Relative Density," Product Safety Labs, Dayton, NJ, Laboratory Study Number 10667, 14 pages. *Reject (04)*

Vol. 5, Merkel, D.J., "Primary Eye Irritation Study in Rabbits," Product Safety Labs, Dayton, NJ, Laboratory Study Number 10670, 16 pages. *Reject (05)*

Vol. 6, Merkel, D.J., "Primary Skin Irritation Study in Rabbits," Product Safety Labs, Dayton, NJ, Laboratory Study Number 10671, 16 pages. *Reject (06)*

Vol. 7, Merkel, D.J., "Acute Oral Toxicity Study in Rats-Limit Test," Product Safety Labs, Dayton, NJ, Laboratory Study Number 10668, 15 pages. **45481404**

Vol. 8, Merkel, D.J., "Acute Dermal Toxicity Study in Rats-Limit Test," Product Safety Labs, Dayton, NJ, Laboratory Study Number 10669, 16 pages. **45481405**

DATA TRANSMITTAL DOCUMENT
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List of Submitted Studies, (cont'd)

ADMIN

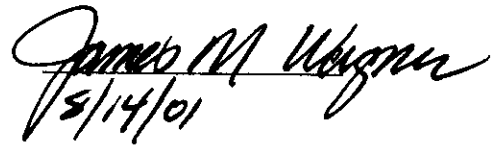
Vol. 9, Wagner, J.M., "Acute Inhalation Toxicity and Skin Sensitization: Request for Data Waivers", Wagner Regulatory Associates, Inc., Wilmington, DE, Report Number WRA-01-004, 5 pages.

Vol. 10, Suchmann, D.B., "AOAC Use Dilution Test Broad Spectrum," MicroBioTest, Inc., Sterling, VA, Laboratory Project ID Number 464-101, 23 pages. **45481406**

Vol. 11, Suchmann, D.B., "AOAC Use Dilution Test," MicroBioTest, Inc., Sterling, VA, Laboratory Project ID Number 464-102, 21 pages.

45481407

Company Official: James M. Wagner



Company Name: Wagner Regulatory Associates, Inc.

Company Contact: James M. Wagner
Name

(302) 529-9075
Phone